

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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 SONTERRA CAPITAL MASTER FUND LTD., :
 FRONTPOINT EUROPEAN FUND, L.P., :
 FRONTPOINT FINANCIAL SERVICES FUND, :
 L.P., FRONTPOINT HEALTHCARE FLAGSHIP : Case No. 15-cv-00871 (SHS)
 ENHANCED FUND, L.P., FRONTPOINT :
 HEALTHCARE FLAGSHIP FUND, L.P., :
 FRONTPOINT HEALTHCARE HORIZONS :
 FUND, L.P., FRONTPOINT FINANCIAL :
 HORIZONS FUND, L.P., FRONTPOINT UTILITY : **DECLARATION OF**
 AND ENERGY FUND L.P., HUNTER GLOBAL : **PIERRE-ANTOINE SAUCIER ON**
 INVESTORS FUND I, L.P., HUNTER GLOBAL : **BEHALF OF GOTTEX BROKER SA IN**
 INVESTORS OFFSHORE FUND LTD., HUNTER : **SUPPORT OF FOREIGN BROKER**
 GLOBAL INVESTORS SRI FUND LTD., HG : **DEFENDANTS' MOTION TO DISMISS**
 HOLDINGS II LTD., HG HOLDINGS II LTD., : **FOR LACK OF PERSONAL**
 FRANK DIVITTO, RICHARD DENNIS, and the : **JURISDICTION**
 CALIFORNIA STATE TEACHERS' :
 RETIREMENT SYSTEM on behalf of themselves :
 and all others similarly situated, :

Plaintiffs,

v.

CREDIT SUISSE GROUP AG, CREDIT SUISSE :
 AG, JPMORGAN CHASE & CO., THE ROYAL :
 BANK OF SCOTLAND PLC, UBS AG, :
 DEUTSCHE BANK AG, DB GROUP SERVICES :
 UK LIMITED, TP ICAP PLC, TULLETT PREBON :
 AMERICAS CORP., TULLETT PREBON (USA) :
 INC., TULLETT PREBON FINANCIAL :
 SERVICES LLC, TULLETT PREBON (EUROPE) :
 LIMITED, COSMOREX AG, ICAP EUROPE :
 LIMITED, ICAP SECURITIES USA LLC, NEX :
 GROUP PLC, INTERCAPITAL CAPITAL :
 MARKETS LLC, GOTTEX BROKERS SA, :
 VELCOR SA AND JOHN DOE NOS. 1-50, :

Defendants.

I, Pierre-Antoine Saucier, declare under penalty of perjury as follows:

1. I am the Chief Operating Officer of Gottex Brokers SA ("Gottex") in Lausanne, Switzerland.
2. I submit this Declaration on behalf of Gottex in support of Foreign Broker Defendants' Motion to Dismiss for Lack of Personal Jurisdiction. This Declaration is based upon my personal knowledge and is true and correct to the best of my knowledge and belief. Unless another date range is indicated, the following facts were true and correct from January 1, 2001 through the date of this Declaration.
3. Gottex has been and continues to be organized under the laws of Switzerland.
4. Gottex had and has its registered office and principal place of business in Lausanne, Switzerland. Gottex has no offices in the United States.
5. Gottex had and has no American shareholders, and Gottex does not list stock on any public exchanges, including any in the United States.
6. Gottex did not and does not have any employees in the United States.
7. Gottex did not and does not maintain any bank accounts in the United States.
8. Gottex did not and does not pay taxes to the United States government.
9. All of Gottex's brokers were based and are based outside of the United States. The vast majority of their communications were and continue to be with traders and dealers who were either also in Switzerland or elsewhere in Europe.
10. Gottex's business focused and focuses on brokering transactions in financial markets in Europe.

11. Gottex was and is an interdealer broker, meaning that it acts as an intermediary between financial institutions that act as dealers. As such, its primary source of revenue is the fixed commissions it receives on the transactions between dealers that it brokes.

12. Gottex did not and does not engage in transactions with any "retail" customers or end users.

13. Gottex did not and does not hold proprietary positions in any derivative products, including CHF LIBOR-based derivatives.

14. Gottex did not and does not transact for its own account in CHF LIBOR-based derivatives.

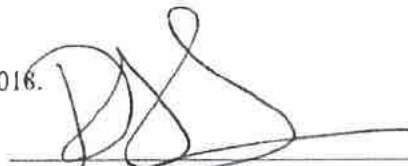
15. Gottex has never brokered CHF LIBOR-based derivative transactions with any of the Plaintiffs in this action.

16. Gottex did and does maintain an electronic screen related to CHF LIBOR. This screen was and is housed on servers in Switzerland and was and is updated by Gottex employees located in Switzerland.

17. [REDACTED]

I, Pierre-Antoine Saucier, Chief Operating Officer of Gottex, declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief.

Executed in Lausanne, Switzerland on March 29, 2016.



Pierre-Antoine Saucier